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LATED CORRESPONDENCE

Sinnissippi Alliance for the Environment

326 North Avon Street Rockford, Illinois 61103

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Mr. Alan Bielawski
Isham, Lincoln & Beale
Suite 5200
Three First National Plaza
Chicago, IL. 60602

June 24, 1984

50-454 0L
50-455 0L

Re: Byron Station Stipulated Emergency Planning
Commitments M, N, P, U, V, W

Dear Alan:

In accordance with Section 4(d) of the Stipulation, dated March 30, 1983, signed by the parties to the Byron Operating License Proceedings, Intervenors DAARE/SAFE and the Rockford League of Women Voters hereby respond to Commonwealth Edison's notification to Intervenors, dated June 7, 1984, of Commonwealth Edison's belief that it has satisfied Commitments M, N, P, U, V, and W. Please find set forth in the attached pages Intervenors responses to each Commitment notification.

Very truly yours,

Patricia A. Morrison
on behalf of Rockford
League of Women Voters

Diane Chavez
legal representative,
DAARE/SAFE

- cc: Judge Smith
- Judge Callihan
- Judge Cole
- Richard Rawson
- Jane Whicher
- Paul Holmbeck
- Erie Jones
- Sheriff Brooks

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COMMITMENT M

Demonstrate that IPRA includes adequate provisions for alternative protective actions, in the event evacuation of homebounds and nursing home patients is infeasible.

Response:

The information provided by Commonwealth Edison to the Intervenor in a letter response dated June 7, 1984, fails to provide sufficient information to allow the Intervenor to determine whether Commitment M has been satisfied. Moreover, said response letter is deficient on its face to the extent that nursing home Dosimetry Control Officers have yet to receive DCO training from the Illinois Department of Nuclear Safety, as per Edison's modification letter of June 12, 1984.

On information and belief Intervenor state that at least one nursing home director and his staff (Pinecrest Manor) have not received operational and radiological training, as per Edison's response letter.

Intervenor are undergoing efforts to verify that IPRA includes adequate provisions for alternative protective actions, in the event evacuation of homebounds and nursing home patients is infeasible.

COMMITMENT N

Demonstrate that there has been an assessment of the number and location of special transport-dependent individuals and that this information is available to Ogle County emergency response officials.

Response:

Intervenors disagree that Commonwealth Edison has satisfied Commitment N based on its response letter dated June 7, 1984. Edison's letter refers only to the Mobility Impaired Transportation List maintained by Ogle Emergency Services and Disaster Agency (ESDA). However, Ogle County 6-SOP-8, the Standard Operating Procedure entitled "Byron Station EPZ Sheltering and Evacuation-General Population", requires a second mobility impaired list be maintained by Yellowbird Senior Citizens Center and that the two lists be cross-referenced in the event of an emergency in order to identify special transport-dependent individuals. Commonwealth Edison's response letter fails to refer to the mobility impaired list to be maintained by the Yellowbird Senior Citizens Center. Moreover, on information and belief Intervenors state that no such mobility impaired list is currently maintained by Yellowbird, and further, that Commonwealth Edison has failed to contact Yellowbird with regard to said list. The assessment referred to in Edison's response letter is not complete or accurate.

COMMITMENT P

Demonstrate that adequate radiological emergency response training has been made available and retraining will be made available to all response organizations and individuals who may be called upon to assist in an emergency, viz., directors and coordinators of the response organizations; first aid and rescue personnel; medical support personnel; and those other off-site organizations identified in IPRA having mutual aid agreements or arrangements with local agencies.

Response:

The information provided by Commonwealth Edison to the Intervenor in a letter response dated June 7, 1984, fails to provide sufficient information to allow the Intervenor to determine whether Commitment P has been satisfied. Specifically the fifteen training manuals upon which Commonwealth Edison's response letter relies have not been provided. These manuals have been requested by the Intervenor through standing orders since August 1983. Moreover, said response letter is deficient on its face to the extent that local officials have yet to receive Re-entry Procedures training (6-ERT-15) from the Illinois Emergency Services and Disaster Agency (IESDA), as per Edison's notification.

With respect to the training sessions, from information provided in the response letter Intervenor is unable to determine which personnel attended which training sessions. More importantly, the Emergency Worker Training and the Dosimetry Control Officer Training given to emergency workers and DCO's by the Illinois Department of Nuclear Safety is inadequate to the extent that the instruction in radiation instrumentation received by said personnel utilized outdated and inadequate dosimetry equipment and that more sensitive dosimetry equipment and accompanying instruction has not been provided to all emergency personnel to date. The Emergency Worker Training was the only

training session Intervenor were given notice of and permitted to attend. On information and belief Intervenor state that contrary to Edison's July 15, 1983 Reply to Intervenor Findings of Fact and Conclusions of Law regarding Emergency Planning, the training sessions for volunteers have not "provided state planners an opportunity to assess the willingness of individual volunteers to carry out their assigned responsibilities, during a radiological emergency." (Also see Initial Decision, p. 401, entered January 13, 1984) Based on the October 1983 Emergency Workers Training session attended by Intervenor Commonwealth Edison clearly has failed to provide reasonable assurance that response organizations will be capable of effectively implementing the IPRA-Byron.

COMMITMENT U

Demonstrate that there are adequate resources and procedures to effectuate notification by Edison of State and County emergency response organizations, and for notification of emergency personnel by these organizations.

Response:

The information provided by Commonwealth Edison to the Intervenor in a letter response dated June 7, 1984, fails to provide sufficient information to allow the Intervenor to determine whether Commitment U has been satisfied. Intervenor is undergoing efforts to verify the dependability and the time response of the communication systems to be utilized in a radiological emergency as set forth in Commitment U.

COMMITMENT V

Demonstrate that adequate communications capabilities exist for the Ogle County emergency response organization.

Response:

Intervenors disagree that Commonwealth Edison has satisfied Commitment V based on its response letter dated June 7, 1984. Edison's letter refers to the Ogle County-wide school bus communication system which school districts both within and outside the Byron EPZ participate in and rely upon. On information and belief Intervenors state that no such system is currently operational, or has been procured to date.

Intervenors are undergoing efforts to verify the dependability and the time response of all other communication systems to be utilized in a radiological emergency as set forth in Commitment V.

COMMITMENT W

- (a) Edison agrees to contact and make its personnel with knowledge of the Byron emergency plan available to the mayors of Rochelle, Dixon and Rockford to discuss emergency planning for Byron. In order to aid these officials in identifying concerns, Edison will send the mayor of Rochelle, Dixon and Rockford the following information:
- (i) a description and explanation of protective and parallel actions to be taken during an emergency;
 - (ii) a description and explanation of what would be required of each of the cities if they were designated as a host for evacuees;
 - (iii) a description and explanation of measures to be taken by the state for the ingestion exposure pathway;
 - (iv) relevant information on the planning bases for IPRA; and
 - (v) the complete procedure for protection and parallel actions to be followed by the city of Oregon.
- (b) Demonstrate that the Byron Station public information brochure has been made available to the mayors of Rockford, Rochelle and Dixon.
- (c) Edison further agrees to critically review any material, plans or proposals about protection action submitted to them by the mayors of Rockford, Rochelle and Dixon.
- (d) Edison further agrees to demonstrate that it has developed an adequate procedure to assure that as new mayors of these communities take office they will be provided with the information described above and that Edison will make its personnel available to discuss emergency planning issues.

Response:

Intervenors disagree that Commonwealth Edison has satisfied Commitment W based on its response letter dated June 7, 1984. Said letter is deficient on its face in that Edison has failed to allow the mayors of Rochelle, Dixon, and Rockford adequate time to respond to its May 29, 1984 letter and specifically fails to inform the Mayors in said letter of its agreement to critically review any material,

plans or proposals about protection action submitted to them by the
Mayors.